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Letter dated 31 July 2002 from the Chairman of the Security Council Committee established pursuant to resolution 1373 (2001) concerning counter-terrorism addressed to the President of the Security Council

I write with reference to my letter of 3 May 2002 (S/2002/522).

The Counter-Terrorism Committee has received the attached supplementary report from Finland, submitted pursuant to paragraph 6 of resolution 1373 (2001) (see annex).

I should be grateful if you could arrange for this letter and its annex to be circulated as a document of the Security Council.

(*Signed*) Jeremy **Greenstock**
Chairman
Security Council Committee established pursuant to
resolution 1373 (2001) concerning counter-terrorism

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Annex

Letter dated 11 July 2002 from the Permanent Representative of Finland to the United Nations addressed to the Chairman of the Security Council Committee established pursuant to resolution 1373 (2001) concerning counter-terrorism

Further to your letter dated 1 May 2002, I have the honour to forward to you the Government of Finland's second report to the Counter-Terrorism Committee established pursuant to paragraph 6 of Security Council resolution 1373 (2001) concerning counter-terrorism (see enclosure).

(*Signed*) Marjatta **Rasi**
Ambassador
Permanent Representative of Finland

Enclosure

Report to the Counter-Terrorism Committee of the Security Council in response to its letter of 1 May 2002

Subparagraph 1 (a)

Please could Finland provide a progress report on the review of its legislation for the implementation of the Financial Action Task Force's Eight Special Recommendations on terrorist financing?

The following amendments to the Act on the Detection and Prevention of Money Laundering (68/1998, hereinafter referred to as the Act on Money Laundering, AML) are under consideration: amendments due to the obligations set out in the special counter-terrorist recommendations of the FATF; amendments due to the provisions of Article 18 of the International Convention for the Suppression of the Financing of Terrorism; and amendments due to the revision of the European Union directive on prevention of money laundering. Chapter 32, section 1 of the Penal Code will also be amended to implement the measures set forth in the FATF recommendations. The Government Bill comprising these amendments will be submitted to Parliament in September – October 2002.

In accordance with the FATF recommendations, the objective and the scope of the AML will be extended so as to cover the financing of terrorism. The bill also proposes to extend the concept of a person under obligation to report a suspicion of money laundering to cover accountants, book-keepers, dealers and suppliers of valuables, auctioneers and persons assisting in legal matters through a business or professional practice. The proposed amendment to the Finnish Act is based on the Directive 2001/97/EC of the European Parliament and of the Council of 4 December 2001 (2001/97/EC, OJ L 344, 28 December 2001, p. 76—81) amending Council Directive 91/308/EEC on prevention of the use of the financial system for the purpose of money laundering.

According to the present AML, the bodies under obligation to report include credit and financial institutions, investment companies, fund management companies and custodians, co-operative societies engaged in the savings fund activities, insurance companies, agencies of foreign insurance companies, insurance brokers, pawnshops, entities engaged in the activities relating to betting, betting on the totalizator or to casinos as well as entrepreneurs or entities acting as agents collecting participation coupons and fees related to the results of the pools, races and betting on the totalizator, real estate businesses and apartment rental agencies engaged in renting business premises, and central securities depositories.

These bodies are under obligation to identify customers and to take note of any irregular or suspicious transactions. They are required to report any suspicious transactions to the Money Laundering Clearing House at the National Bureau of Investigation . Once the new Act enters into force, these bodies are obliged to report also any suspected financing of terrorism.

The Act on Money Laundering provides that a body under the reporting obligation has the possibility to refuse transactions. Along with the amendments to the Act, the scope of the provision in question will be extended to the financing of terrorism. Once the Act is in force, credit and monetary institutions may refuse to receive funds, if there is reason to believe that the assets would be used for the financing of terrorism.

As funds held by a person or entity connected with terrorism need not be laundered money, please outline how Finnish law prevents the holding of such funds in Finnish financial institutions.

The due diligence obligation set forth in the current Act on Money Laundering, as well as in the Act on Credit Institutions, Act on Investment Firms and Act on Mutual Funds, aims at ensuring that financial institutions observe strict know-your-customer rules and follow good banking practice and good securities market practice.

Financial institutions have not only an obligation to identify their customers but also a duty to know their customers' operations as well as the grounds for and purpose and reason of using the respective institution's services. If the financial institution does not have sufficient information concerning the background or business of the customer, it is difficult to assess the suspicious nature of any transaction. From the financial institutions' viewpoint, largely the same know-your-customer rules also apply to transactions related to the funding of terrorism.

The Financial Supervision Authority (FSA) has a duty to ensure that the supervised entities consistently observe good banking practice and good securities market practice. The requirements of due diligence and prevention of money laundering are part of the risk management and internal controls of supervised entities, which are the areas the FSA has focused on in its supervisory action. The FSA makes inspection and supervisory visits to the supervised entities to ensure that their operations and internal risk management and control systems are sufficiently advanced so that internal and external criminal activities can be identified and prevented at an early stage. The FSA is also obliged to inform the Money Laundering Clearing House if it notices anything in the operations of a supervised entity that gives reason to suspect negligence with regard to the AML rules.

> *Are natural or legal persons (e.g. financial institutions, attorneys, notaries and other intermediaries) required to report suspicious transactions to the public authorities? If so, what penalties apply to persons who omit to report either wilfully or by negligence?*

Pursuant to section 3 of the Act on Money Laundering, financial institutions are required to report any suspicious transactions to the Money Laundering Clearing House. These persons shall notify the Money Laundering Clearing House without delay, in accordance with section 10 of the AML, of any business activities where there is reason to doubt the legal origin of the assets or other property involved in the activities. The afore-mentioned bill proposes that the concept of suspicious transactions referred to in section 10 be extended to also cover business activities suspected of involving terrorist financing.

Under Chapter 32, section 1, subsection 2, paragraph 3 of the Penal Code, a person shall be sentenced for a receiving offence if he fails to report a suspicious transaction as referred to in section 10 of the Act on Money Laundering or, in violation of the prohibition provided for in section 10, discloses a report referred to therein. The person shall be sentenced to a fine or to imprisonment for at most six months.

A Government Bill concerning the amendment of certain provisions of the Penal Code and certain acts involving financial offences (Government Bill HE 53/2002 vp) proposes to incorporate the failure to report a suspicion of money laundering into the AML as a new section 16 a. Any person failing to comply with the reporting obligation could then be sentenced to a fine. Be it also noted that a failure to report a suspicion of money laundering may constitute an intentional money laundering offence or an offence of negligence. If the scope of the Act on Money Laundering is widened as proposed, consequently extending the concept of a suspicious transaction to cover business activities suspected of involving terrorist financing, the provisions on money laundering offences committed deliberately or of negligence would become applicable to the actions of a person obliged to report a suspicion of money laundering if he or she fails to examine the background of a suspicious transaction.

A person sentenced for a money laundering offence committed of negligence could, if the afore-mentioned bill is passed, be sentenced to a fine or to imprisonment for at most two years. The bill also

includes a proposal to raise the maximum penalty for a deliberate money laundering offence from six months to two years and for an aggravated money laundering offence from four years to six years.

Subparagraph 1 (b)

Please provide a progress report on the amendments to the Penal Code under way and outline the relevant provisions

The Act on the implementation of the Convention for the Suppression of the Financing of Terrorism (Government Bill 43/2002 vp) was approved by the Parliament in June. The Penal Code, section 34, was amended at the same time so as to establish the financing of terrorism as a criminal offence. A person found guilty of the financing of terrorism will be sentenced to imprisonment for at least four months and at most eight years. The criminal liability of a legal person will also be extended to apply to the financing of terrorism.

As regards the other amendments to the Penal Code, a Government Bill on a new Chapter concerning terrorist crimes has been submitted to experts for comments. The government bill also includes terrorism-related amendments to the Coercive Measures Act. The provisions of the framework decision of the Council of the European Union on combating terrorism and, where applicable, the requirements of the UN Security Council Resolution 1373 have been taken into account in the preparation of the bill. The provisions implementing the Convention for the Suppression of the Financing of Terrorism have also been taken into account.

The Bill includes a proposal to incorporate a separate Chapter concerning terrorist offences in the Penal Code as a new Chapter 34 a. The Chapter would contain provisions on terrorist offences, preparation of terrorist offences, leading of a terrorist group, participation in the activities of terrorist groups, financing of terrorism, and definition of the terrorist purpose of an offence, as well as a provision on the criminal liability of legal persons. The provision on the financing of terrorism would be based on the International Convention for the Suppression of the Financing of Terrorism. It is therefore proposed that the provision included in the Act implementing the Convention be inserted in the new Chapter of the Penal Code on terrorist offences as such or with minimal adjustments.

The instrument of ratification regarding the International Convention on the Suppression of the Financing of Terrorism was deposited with the Secretary General of the UN on 28 June, 2002. The Convention, as well as the related legislation will therefore enter into force on 28 July, 2002. The Government Bill concerning the other amendments to the Penal Code will be submitted to Parliament in the autumn of 2002.

Subparagraph 1 (c)

It is not clear how Finland would deal with the request of a country outside the European Union to freeze the assets and resources in Finland of a person or entity supporting terrorism in that country. Does the amendment referred to in the reply to this sub-paragraph cover requests from such countries? Please provide a progress report on the amendments.

The Act amending the Act on the Enforcement of Certain Obligations of Finland as a Member of the United Nations and of the European Union ("Sanctions Act", 659/1967 as amended by the following Acts: No 705/1997, No 191/2000 and No 364/2002) as well as the Act (No. 365/2002) amending Chapter 46, section 1 (11) of the Finnish Penal Code entered into force on 22 June 2002.

As foreseen in the report submitted to the CTC on 21 December 2001, the Sanctions Act and the Penal Code, as amended, provide for the penalties to be imposed when the European Union sanctions, imposed under certain provisions (article 60, 301 or 308) of the Treaty establishing the European Union, are violated.

According to Chapter 46, section 1 (11) of the Penal Code, a person who violates or attempts to violate a regulatory provision in a sanctions regulation, adopted on the basis of Article 60, 301 or 308 of the Treaty establishing the European Community, shall be sentenced for a regulation offence to a fine or to imprisonment for at most four years. Due to these amendments, it is possible for Finland to impose sanctions if the EU regulations implementing SC resolutions 1373(2001) and 1390(2002) are infringed.

The existing Finnish legislation does not provide for a possibility to freeze assets of individuals or entities unless the obligation is based on sanctions imposed by the UN Security Council or the Council of the European Union.

Subparagraph 1 (d)

What preventive control and surveillance has Finland put in place to ensure that funds and other economic resources collected for religious, charitable or cultural purposes are not diverted for financing terrorism?

See sub-paragraph 1 a) above.

The Ministry of the Interior has set up a working party to review the existing legislation and to make recommendations on how to enhance the control of fundraising by charitable organizations, including religious organizations.

Subparagraph 2 (a)

It is noted that Finland is a party to a number of conventions on the regulation of trade in arms. Please outline the laws which give effect to the conventions, including those which make the relevant acts offences.

Council Directive 91/477/EEC of 18 June 1991 on the control of the acquisition and possession of weapons as well as Council Directive 93/15/EEC of 5 April 1993 on the harmonisation of the provisions relating to the placing on the market and supervision of explosives for civil uses in relation to transfer of cartridges were implemented by the Firearms Act of 1 March 1998. The provisions of the Schengen Agreement of 14 June 1985 on the gradual abolition of checks at common borders and the provisions of the Convention implementing the Schengen Agreement (signed on 19 June 1990), related to firearms, firearm components, cartridges and specially dangerous projectiles, were also implemented by the Firearms Act.

Finland signed the United Nations Convention against Transnational Organised Crime on 12 December 2000 and the supplementing Protocol against the Illicit Manufacturing of and Trafficking in Firearms, Their Parts and Components and Ammunition in January 2002. Finland is preparing the ratification of the Convention and its supplementing Protocol. It should be noted that the supplementing Protocol requires that Council Directive 91/477/EEC of 18 June 1991 on the control of the acquisition and possession of weapons be amended.

An unofficial English translation of the Firearms Act is attached hereto. The newest amendments which entered into force on 1 March 2002 have not been translated yet.

Please inform the CTC when the new penal provisions on offences relating to terrorist groups have been incorporated into the domestic law, and provide an outline of the relevant provisions?

The commission of offences as a member of a group organized for the purpose of committing serious offences is already a ground for increasing the punishment under Chapter 6, section 2 of the Penal Code. In the light of the Government Bill on the amendment of the legislative provisions concerning the general principles of criminal law (Government Bill HE 44/2002 vp), the substance of the provision would remain the same.

Participation in the activities of a criminal organization has been proposed to be established as a punishable offence. A Government Bill to that effect (Government Bill HE 183/1999 vp) has been submitted to Parliament. Pursuant to the Bill, participation in the activities of a criminal organization would be considered punishable when the participation is active and the objective of the activity is to commit offences, where the maximum penalty provided for is imprisonment for at least four years, or when its objective is ethnic agitation. Participation could be punished if the main offence is actually committed, and the applicable sentence would be a fine or imprisonment for at most one year. If a person can be considered an accomplice in respect of an offence committed by a criminal organization, he would be sentenced for having actually committed the offence in question, the punishment being considerably more severe.

The proposed Chapter 34 a on terrorist offences to be incorporated in the Penal Code (see sub-paragraph 1 b above) would contain provisions criminalizing participation in the activities of a terrorist organization and leading of a terrorist organization. Under the provision prohibiting participation in the activities of a terrorist organization, for example the founding of a terrorist organization, recruitment of members, arming, training and provision of supplies essential for the group's activities would be subject to punishment.

Subparagraph 2 (b)

Please inform the CTC whether there are any arrangements to provide early warning to countries outside the European Union.

If a threat were to appear, the relevant countries within as well as outside the EU would be informed immediately through the international channels of cooperation of the Finnish Security Police. No specific arrangements have been made to provide a system of early warning in respect of EU or other countries.

Please provide information on the mechanisms for inter-agency cooperation between the authorities responsible for narcotics control, financial tracking and security with particular regard to the border controls preventing the movement of terrorists.

The National Bureau of Investigation investigates serious organised and professional crime in Finland. The Money Laundering Clearing House is a unit of the National Bureau of Investigation. Co-operation between the different units of the Bureau, as well as between local police departments and other authorities is efficient. Cooperation between the police, customs and border management authorities is regulated by law.

Subparagraph 2 (c)

Please explain why section 37 of the Aliens Act refers to the possibility of the commission by a foreign national seeking entry to Finland of an offence only in Finland or another Nordic country, as opposed to any other country.

The existing section 37, subsection 1, paragraph 5 of the Aliens Act refers to offences committed in Finland or another Nordic country. An overall reform of the Aliens Act is being prepared with a proposal to withdraw the reference in question.

For example sabotage is provided for in section 37, subsection 1, paragraph 6 of the Aliens Act, and the paragraph does not include the afore-mentioned territorial restrictions. This paragraph can be applied to terrorist acts.

Subparagraph 2 (d) and (e)

How does Finland prevent (or how does it propose to prevent) persons engaged in legitimate activities in Finland form supporting terrorist activities outside Finland?

The afore-mentioned activities could, depending on their nature, be punished pursuant to the proposed provisions concerning participation in the activities of a terrorist organization, financing of terrorism or preparation of a terrorist offence. The provisions regarding the financing of terrorism will provide the authorities with a possibility to intervene in the fund-raising of terrorist organizations at an early stage and consequently prevent the use of such funds to commit terrorist acts.

Please indicate what are the "international offences" under the Finnish Penal Code

International offences are provided for in Chapter 1, section 7 of the Penal Code, and regardless of the legislation of the territory they are committed in, the punishment to be applied to such offences is based on an international agreement binding on Finland or another international provision binding on Finland. Further provisions on the application of section 7 may be given by Government decree.

The Decree concerning the application of section 7 of the Penal Code defines the following offences as international offences:

1) Commission or preparation of the crime of counterfeiting currency, or the use of counterfeited currency, referred to in the International Convention for the Suppression of Counterfeiting Currency (Finnish Treaty Series (FTS) 47/1936) (added by Act No. 370/2001); and counterfeiting in respect of euro referred to in Article 7, paragraph 2 of the Council framework Decision of 29 May 2000 on increasing protection by criminal penalties and other sanctions against counterfeiting in connection with the introduction of the euro (Official Journal L 140, 14/06/2000, p. 0001-0003);

2) Such war crime, violation of human rights in a state of emergency, serious war crime or other punishable criminal act which must be considered a grave breach of the Geneva Conventions for the Amelioration of the Condition of the Wounded and Sick in Armed Forces in the Field, for the Amelioration of the Condition of the Wounded, Sick and Shipwrecked Members of Armed Forces at Sea, Relative to the Treatment of Prisoners of War, and Relative to the Protection of Civilian Persons in Time of War (FTS 8/1955), as well as the Protocol Additional to the Geneva Conventions, relating to the protection of victims of non-international armed conflicts (FTS 82/1980);

3) Commission and preparation of the crime of genocide referred to in the Convention on the Prevention and Punishment of the Crime of Genocide (FTS 5/1960);

4) Commission, preparation and facilitation of a narcotics offence or aggravated narcotics offence or the commission of an concealment offence as referred to in the Single Convention on Narcotic Drugs of 1961 (FTS 43/1965), the Protocol amending the Single Convention on Narcotic Drugs of 1961 (FTS 42/1975), the Convention on psychotropic substances (FTS 60/1976), and the United Nations Convention against illicit traffic in narcotic drugs and psychotropic substances (FTS 44/1994);

5) Such seizure of aircraft or other punishable act by which the perpetrator unlawfully, by force or threat thereof, seizes or exercises control of an aircraft, and which must be considered an offence referred to in the Convention for the suppression of unlawful seizure of aircraft (FTS 62/1971);

6) Such criminal traffic mischief or criminal mischief, preparation of endangerment or other punishable act which must be considered an offence referred to in the Convention for the suppression of unlawful acts against the safety of civil aviation (FTS 56/1973);

7) Murder, or attack upon the person or liberty of an internationally protected person, or violent attack upon the official premises, the private accommodation or the means of transport of such a person, or a threat thereof, referred to in the Convention on the Prevention and Punishment of Crimes against Internationally Protected Persons, including Diplomatic Agents (FTS 63/1978);

8) Hostage-taking or other deprivation of liberty referred to in the International Convention against the Taking of Hostages (FTS 38/1983);

9) Such torture for the purpose of obtaining a confession, and assault or aggravated assault, which must be considered torture within the meaning of the Convention against Torture and Other Cruel, Inhuman or Degrading Treatment or Punishment (FTS 60/1989);

10) Such nuclear device offence, endangerment of health, fraudulent use of nuclear energy or other punishable act directed at or committed by using nuclear material which must be considered an offence referred to in the Convention on the Physical Protection of Nuclear Material (FTS 72/1989);

11) Such deprivation of liberty or aggravated deprivation of liberty, kidnapping, criminal mischief, endangerment or other punishable act that must be considered an offence referred to in the European Convention on the Suppression of Terrorism (FTS 16/1990);

12) Such killing, assault, deprivation of liberty or kidnapping inflicted upon a person on board a ship or aircraft, or seizure or theft of or damage caused to property on board a ship or aircraft, that must be considered piracy within the meaning of the United Nations Convention on the Law of the Sea (FTS 50/1996);

13) Violation of the prohibition of chemical weapons referred to in the Convention on the Prohibition of the Development, Production, Stockpiling and Use of Chemical Weapons and on their Destruction (FTS 19/1997);

14) Such unlawful act against the safety of maritime navigation as is referred to in the Convention for the Suppression of Unlawful Acts against the Safety of Maritime Navigation (FTS 11/1999);

15) Such unlawful act against the safety of fixed platforms located on the Continental Shelf as is referred to in the Protocol for the Suppression of Unlawful Acts against the Safety of Fixed Platforms Located on the Continental Shelf (FTS 44/2000);

16) Such offence against United Nations and associated personnel as is referred to in the Convention on the Safety of United Nations and Associated Personnel (FTS 2—3/2001).

17) Such unlawful and intentional delivery, placement, discharge or detonating of an explosive or other lethal device in, into or against a place of public use, a State or government facility, a public transportation system or an infrastructure facility as is referred to in the International Convention for the Suppression of Terrorist Bombings.

A punishable attempt of and punishable participation in the above-mentioned offences are considered international offences.

Upon the implementation of the International Convention for the Suppression of the Financing of Terrorism, the offences referred to therein will also be established as international offences.

If the definition of a certain offence is not directly based on an international agreement or other binding international provision, the offence cannot be defined as an international offence by decree. In such a case, however, it is possible to enact an Act of Parliament for that purpose.

Upon the implementation of the Comprehensive Nuclear Test-Ban Treaty, the offences referred to therein were established as international offences by adding a new subsection 2 to section 7 of Chapter 1 of the Penal Code, although it was not required by the Convention. The amendment has not come into force yet.

Furthermore, the offences included in the proposed Chapter 34 a of the Penal Code on terrorist crimes are likely to be established as international offences by law, although the Council framework decision concerning the suppression of terrorism does not necessarily require it.

Please explain whether the jurisdiction of the Finnish courts would extend to foreigners in Finland who are accused of "international offences" under the Finnish Penal Code.

Under Chapter 1, section 7 of the Penal Code, the jurisdiction of Finnish courts covers acts which are not necessarily directly connected with Finland. Pursuant to this section, mere presence in the Finnish territory is sufficient for prosecution in a Finnish court against a foreign person suspected of an international offence.

Subparagraph 2 (f)

This sub-paragraph requires assistance to be provided to States in need in connection with criminal investigations or proceedings. Is there any law which allows this assistance to be provided to States outside the European Union? Is the Finnish Act on International Legal Assistance in Criminal Matters (Act. No. 4/1994) relevant?

The provisions of the Act on International Legal Assistance in Criminal Matters (4/1994) are applicable to international legal assistance in criminal matters that are within the jurisdiction of the requesting Finnish or foreign authority. The act applies both to international legal assistance in individual criminal matters being handled by Finnish authorities and to how and under what conditions Finnish authorities give legal assistance in a criminal matter handled by a foreign authority. Legal assistance in criminal matters can be given under the above-mentioned act regardless of whether there is an existing agreement on legal assistance between Finland and a second state, and the provision of legal assistance does not require reciprocity. The act also renders possible the provision of legal assistance to states not members of the European Union.

Legal assistance referred to in the act may include, among others, the service of decisions, summons and other documents relating to the handling of case in question, hearing of witnesses and experts as well as of other persons involved in the case, statements given by experts, inspections, accepting of documents and evidence as well as coercive measures to obtain evidence or to ensure the enforcement of forfeiture.

In respect of legal assistance, Finnish legislation does not require dual punishability, and therefore, legal assistance can be given in respect of such acts as are not offences under the Finnish law. The use of coercive measures, however, is an exception in respect of which dual punishability is required.

The Money Laundering Clearing House has the right to give Finnish and foreign authorities information on matters concerning the prevention and detection of money laundering. This information-sharing is not limited to the member states of the European Union. As the afore-mentioned amendments to the Act on Money Laundering enter into force, information related to the financing of terrorism can be shared in the same way to States within as well as outside the European Union.

Subparagraph 3 (a)

Does Finland share operational information with States outside the European Union and is there an established procedure for such exchange of information?

Finland exchanges operational information with non-Member States through the international channels of cooperation of the Finnish Security Police.

Subparagraph 3 (d) and (e)

Have the crimes set forth in the relevant international conventions and protocols been included as extraditable offences in the bilateral treaties to which Finland is party?

In Finland, the provisions governing extradition are included in the Extradition Act (456/1970) and the act concerning extradition between Finland and other Nordic Countries (270/1960). Finland allows extradition directly under national law and therefore does not require the existence of a bilateral extradition agreement. Nor does Finland require reciprocity to enable extradition.

Under the Extradition Act, an offence is extraditable if the act for which extradition is requested is an offence for which the maximum penalty provided in Finnish legislation is imprisonment for at least one year or if, in Finland, it would in corresponding circumstances be considered such an offence. The crimes set forth in the conventions referred to in sub-paragraph 3 (d) of the resolution are considered extraditable crimes in Finland. The penalties for these offences are severe enough so that Finland may extradite directly pursuant to national law.

Although Finland may extradite directly pursuant to national legislation, Finland is party to the 1957 European Convention on Extradition and its second additional protocol. In addition, Finland has implemented the 1995 and 1996 EU Conventions relating to extradition.

Finland has also concluded a number of bilateral agreements on extradition, some of which have been replaced by the 1957 European Convention. Finland has existing agreements with the United States, Australia, Canada, Kenya, Sri Lanka, Uganda and New Zealand. Only part of the agreements are based on a list of extraditable offences included therein. There has been no need to revise the lists because, as mentioned above, Finland may extradite directly pursuant to national legislation. The lists may, however, be considered to cover the crimes set forth in the conventions referred to in sub-paragraph 3 (d).

Subparagraph 3 (g)

Please explain whether extradition is governed by legislation and list the countries, if any, with which bilateral treaties on extradition have been concluded.

See sub-paragraphs 3 d) and e) above.

Paragraph 4

Has Finland addressed any of the concerns expressed in paragraph 4 of the Resolution?

The connection between terrorism and organized crime and the means of detection of such connections have been discussed within the Task Force on the Organized Crime in the Baltic Sea Region. In this forum, Finland bears the main responsibility for the measures against money laundering, which relate to suppressing terrorism.

Notes:

The following attachments are on file with the Secretariat and are available for consultation:

- **Act on preventing and clearing money-laundering (68/1998), unofficial English translation;**
- **Aliens Act (537/1999), Section 37, unofficial English translation;**
- **Organizational chart of the Financial Supervision Authority Organization.**